

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

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In re:	: Chapter 11
	:
CIRCUIT CITY STORES, INC., <u>et al.</u> ,	: Case No. 08-35653-KRH
	:
Debtors.	: (Jointly Administered)
-----X	

**DECLARATION OF SUSAN MASONE IN SUPPORT OF RESPONSE OF THE KIMCO
LANDLORDS TO LIQUIDATING TRUST’S OMNIBUS OBJECTIONS TO CLAIMS**

I, Susan Masone, declare and state as follows:

1. I have been employed with Kimco Realty Corporation (and together with certain of its affiliates, the “Kimco Landlords”) since 1979 in the legal department.

2. I have personal knowledge of the relevant facts and the claims of the Kimco Landlords filed in these chapter 11 cases (the “Kimco Claims”), and submit this Declaration in support of the Response of the Kimco Landlords to Liquidating Trust’s Omnibus Objections to Claims (the “Response”).¹

3. Each of the Kimco Claims to which the Liquidating Trust objects were prepared by me and sets forth the amounts then due and owing by the Debtors under the respective Kimco Lease (including damages arising from the rejection of such Kimco Lease). Further, each of the Kimco Claims contained a detailed breakdown by category (rent, CAM, taxes, etc.) of the amounts asserted therein. Due to their voluminous nature, individual copies of the underlying

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

Kimco Leases were not appended to the Kimco Claims; however, such Kimco Leases can be provided to the Liquidating Trust upon request.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 7th day of April, 2011.

/s/ Susan Mason

By: Susan Masone
Title: Senior Paralegal
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